

Message

From: Socha, Julianne [socha.julianne@epa.gov]
Sent: 8/2/2017 5:47:58 PM
To: Socha, Julianne [socha.julianne@epa.gov]; Burdett, Cheryl [burdett.cheryl@epa.gov]
Subject: Conversation with Socha, Julianne

Socha, Julianne 11:48 AM:

What calculations are you unable to do because you lack actual crop yield from Wisconsin CAFOs?

Burdett, Cheryl 11:49 AM:

Four year Phosphorus calculations when fields are over 100 and they have to show a 50% P reduction over 4 year period

Julianne Socha 11:51 AM:

wouldn't you use the actual crop yields to also ensure that nutrient credits from prior cropping year are considered in any adjustments to the next years application rates?

Julianne Socha 11:54 AM:

never mind, accounting for nutrient credits from prior years is part of what you consider when you calculate 4 year phosphorus.

Julianne Socha 11:55 AM:

Another question, have you found that WI CAFOs are reporting weather for the 24-hour prior to and after application?

Burdett, Cheryl 11:56 AM:

For P you only use Manure, which is really ridiculous.

Burdett, Cheryl 11:56 AM:

not fertilizer

Burdett, Cheryl 12:04 PM:

No questions about Phosphorus Credits/

Julianne Socha 12:05 PM:

eh?

Burdett, Cheryl 12:06 PM:

I saw you starting to respond to my last comment on P credits, but you did not send anything.

Julianne Socha 12:13 PM:

nope, thought I found something that required consideration of commercial fertilizer but what I found was not specific to the requirement to reduce P by 50%, CAFOs just need to report N and P applied from additional fertilizers and include commercial fertilizer in their total N and total P reported in their annual report. After I started typing my thought I realized it did not apply.

Burdett, Cheryl 12:14 PM:

Got ya. Well if there is anyway that they are required to consider fertilizer in their P calculations that would be very helpful.

Julianne Socha 12:19 PM:

Their total P that is reported in their annual report must include commercial fertilizer but I have not found anything that requires them to reduce total application of P, just reduce manure P that is applied.

Julianne Socha 12:20 PM:

total P that is applied to a given P is the total P that I was referring to

Burdett, Cheryl 12:20 PM:

Exactly, which in CSD case they are overapplying commercial P

Julianne Socha 12:21 PM:

what about my question about keeping records for weather conditions 24 hour prior to and after applications? are cafos in WI doing this?

Julianne Socha 12:22 PM:

Also, on form 3200-123 Current Crop field, are you seeing CAFOs reporting the prior year actual crop or the crop they plan to plant this upcoming season?

Burdett, Cheryl 12:23 PM:

No they are not keeping the records 24 hours prior to and after. They look at the weather prior to land applying and sometimes document on their Daily logs, but not after.

Julianne Socha 12:23 PM:

keep reading - -I sent another question

Burdett, Cheryl 12:25 PM:

We see that on the Annual Spreading Report and the SnapPlus Nutrient Management and Spreading Report by Crop

Burdett, Cheryl 12:26 PM:

I have not seen a farm that fills out the 3200-123

Burdett, Cheryl 12:26 PM:

I have seen them fill out the 3200-123A daily report

Julianne Socha 12:26 PM:

but are they reporting the actual crop they grew or the crop they plan to grow? they should be reporting both on something.

Burdett, Cheryl 12:27 PM:

No actual crop data.

Burdett, Cheryl 12:27 PM:

I mean no actual crop yield data

Julianne Socha 12:28 PM:

so they are reporting the type of crop they grew and do the reports you have seen also indicate what next season's crops will be?

Burdett, Cheryl 12:29 PM:

We see a range, but it looks like on SnapPlus that it is a drop down menu with different ranges and the facility chooses the range their crop yield fits in; however, in Kewaunee this data has only been planned crop yield not actual. CSD may be putting actual ranges, but the levels for yields are so high, it states in the technical note that this should be verified.

Burdett, Cheryl 12:31 PM:

Yes, it does state what the next crop will be that is in another document called the SnapPlus 590 Assessment, but in Kewaunee these crops change, so what the planned next crop changes when they actually go to spread and the only snapplus document that reflects what actually was planted is the Annual Spreading Report, but the Annual Spreading Report does not provide crop yields.

Burdett, Cheryl 12:32 PM:

I meant when actually go plant it is another crop not what they had planned in their rotation, which is not changed to reflect their crop yields.

Burdett, Cheryl 12:32 PM:

yields.

Julianne Socha 12:33 PM:

thanks -- that is enough info for me right now :)

Burdett, Cheryl 12:33 PM:

Ok if you need me to show you what I mean I have all the documents ready and show you what is happening.

Julianne Socha 12:35 PM:

not right now, I am working on wisconsin's GP review and want to try to address some of the issues you are seeing with individual permits as best as I can through a GP that does not have specific NMP terms yet

Burdett, Cheryl 12:35 PM:

Ok no problem. I probably should stick to finishing my report.